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Correspondence Reference: CRWF-2-AEC-0021

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Department of Planning Industry and Environment
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Dear Katrina,

Crudine Ridge Wind Farm (SSD-6697) Audit Response

A full independent audit was undertaken of the Crudine Ridge Wind Farm (CRWF) pursuant to Condition 8 and 9, Schedule 5 of SSD 6697. The audit was undertaken on site by SNC Lavalin (SNC) 15 July 2020. The audit team comprised Richard Peterson and Georgia Voura from SNC, Crudine Ridge Wind Farm was represented by Patric Millar.

Below is our Proponents Response to the audit pursuant to the provisions of Section 5 of the "Crudine Ridge Wind Farm DPIE Independent Compliance Audit 2020".

Sincerely,

A handwritten signature in black ink that reads "Brendan McAvoy".

Brendan McAvoy
Head of Construction
CWP Renewables Pty Ltd

Background

SNC Lavalin (SNC) was engaged by CWP Renewables (CWP) to undertake an independent Audit of the Crudine Ridge Wind Farm (CRWF) located on Aarons Pass Road, Pyramul. The audit was undertaken pursuant to Condition 8 and 9, Schedule 5 of SSD 6697 and covers the period 12 September 2019 to 22 July 2020.

The site inspection was undertaken on 15 July 2020 and was undertaken by Richard Peterson and Georgia Voura from SNC, Crudine Ridge Wind Farm was represented by Patric Millar.

The audit consisted of an assessment of compliance against:

- Independent Audit Post Approval Requirements (Department of Planning, Industry and Environment May 2020)
- Development Consent (SSD 6697)
- Post approval documents, including an assessment of the effective implementation of Environmental Management Plans and Sub-Plans
- Any environmental licences or other approvals
- Environmental performance including but not limited to:
 - Actual impacts compared with Predicted impacts in the Environmental Impact Statement (EIS)
 - Physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
 - Incidents, non-compliances and complaints
 - Performance of the development, with regard to agency policy and environmental issues identified during consultation when developing the scope of the audit
 - Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project
- Environmental Management System (EMS) at a high level
- A high-level assessment of whether Environmental Management Plans and Sub-Plans are adequate
- Any matter considered relevant by the auditor or DPIE.

Areas of non-compliance

Three areas of non-compliance were identified. These are detailed in Table 1.

Corrective Actions

Corrective actions to be implemented by Crudine Ridge Wind Farm are detailed in Table 1.

Table 1 Audit Findings and Corrective Actions

Condition	Requirement	Status	Action / Recommendation	CRWF Action
3-18	<p>The Applicant shall:</p> <p>a) ensure that all activities are undertaken in accordance with:</p> <ul style="list-style-type: none"> • OEH’s Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; • DPI’s guidelines for waterway crossings and fish passage, including: <ul style="list-style-type: none"> - Policy and Guidelines for Fish Friendly Waterway Crossings (2004), or its latest version; - Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version, and <p>Water Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and ensure that the storage and handling of all dangerous goods and hazardous materials is undertaken in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version.</p>	Non-compliant	<p>The Project was not achieving compliance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) – the “Blue Book”</p> <p>Areas observed that were not in compliance with the “Blue Book” were as follows:</p> <ul style="list-style-type: none"> • Excavations on steep slopes where earthworks had commenced without blue book compliant controls in place • Fill embankments which are unprotected with any form of groundcover or revegetation. An example is the temporary blade storage area (at turbine 10) • Trenched areas where groundcover and/or revegetation had not been applied • Sediment controls that require replacement or maintenance 	<p>See attached report from GEZ</p> <p>Works identified have commenced</p> <p>See attached report from TransGird</p> <p>Works identified commenced</p> <p>CWP will review works for both contractors in November</p>

Condition	Requirement	Status	Action / Recommendation	CRWF Action
			<p>The following recommendations are made:</p> <ul style="list-style-type: none"> • The introduction of a hold-point and sign off process to ensure Blue Book compliant ERSED controls are in place prior to the commencement of excavation. It is recommended that the proposed ERSED controls are endorsed by a Certified Professional in Erosion and Sediment Control (CPESC) • Installation of groundcover as soon as possible following excavation works to prevent erosion • The appointed CPESC returns to the project (within 1 month) to assess existing erosion and sediment control practices and provide recommendations to 	

Condition	Requirement	Status	Action / Recommendation	CRWF Action
			<p>ensure compliance with Blue Book requirements.</p> <ul style="list-style-type: none"> The CPESC provides targeted erosion and sediment control training to key management and supervisory personnel to ensure they are aware of key ERSED principles and their key responsibilities under the relevant legislation The GEZ Environmental Representative undertakes formal training in erosion and sediment control 	
3-32	<p>The Applicant shall ensure that all:</p> <ol style="list-style-type: none"> over-dimensional vehicle access to and from the site is via the northern route using Castlereagh Highway and Aarons Pass Road; over-dimensional vehicle access through Mudgee is via: <ul style="list-style-type: none"> Route 1 (using Castlereagh Highway, Market Street, Douro Street and Horatio Street), for vehicles up to 50 metres length; or 	Non-compliant	<p>Six traffic incidents have occurred which involved the incorrect use of transport routes by heavy vehicles.</p> <p>Observations made during the audit are that the measures implemented by the project in response to these incidents are reasonable and practical and therefore no further recommendations are made.</p>	<p>See attached report from GEZ</p> <p>See attached report from TransGird</p> <p>Both contractors will continue to include information on Heavy Vehicle restrictions on Sallys Flat Road in their pre-starts and site inductions.</p>

Condition	Requirement	Status	Action / Recommendation	CRWF Action
	<ul style="list-style-type: none"> • Route 2 (using Castlereagh Highway, Market Street, Cox Street, Short Street, Lawson Street, Mortimer Street, Burrundulla Avenue and Horatio Street), for vehicles more than 50 metres length; <p>c) other heavy vehicle access to and from the site is via:</p> <ul style="list-style-type: none"> • the northern route using Castlereagh Highway and Aarons Pass Road; or • the southern route using Hill End Road and the Ilford-Sofala Road or Sofala Road; or • the minor access routes using Bombandi Road and/or Crudine Road, unless the Secretary approves otherwise. 			
3-41	<p>The Applicant shall rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning. All reasonable and feasible measures must be taken to minimise the total area exposed at any time. Interim rehabilitation strategies shall be employed when areas prone to dust generation, soil erosion and weed</p>		<p>Audit team observed onsite inconsistencies in rehabilitating areas as soon as possible or the application of interim measures where rehab isn't available immediately.</p> <p>Recommendation:</p> <p>It is recommended that disturbed areas, particularly</p>	<p>See attached report from GEZ</p> <p>Works identified have commenced</p> <p>See attached report from TransGird</p> <p>Works identified commenced</p> <p>CWP will review works for both contractors in November</p>

Condition	Requirement	Status	Action / Recommendation	CRWF Action
	incursion cannot yet be permanently rehabilitated.		steep slopes are rehabilitated as soon as practicable to prevent erosion. Where permanent rehabilitation is not practicable due to seasonal constraints, interim measures such as hydro mulch or polymer should be applied.	

Conclusion

The areas of non-conformance identified by SNC Lavalin have been raised with the Contractors and are being addressed. Ongoing compliance will be reviewed in three months by an internal audit.